REDACTED VERSION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #1**
Initial Polrep
F.J. Doyle Salvage
061D
Leonard, TX

To: Ronnie Crossland, EPA R6
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From: Gary Moore, FOSC
Date: 11/5/2018
Reporting Period:

1. Introduction

1.1 Background

Site Number:	061D	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	9/7/2018
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	11/5/2018	**Start Date:**	11/5/2018
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

The Site is located at the southwest corner of North Poplar and East Cottonwood Street in Leonard, Fannin County, Texas, 75452. The previous address for the site was (b) (6) however, the current address is 905 North Poplar Street, Leonard, Texas 75452. The Site consists of approximately 0.344 acres.

F.J. Doyle Salvage conducted salvage operations by stripping out-of-service power transmission transformers for recoverable metals. The facility consisted of a transformer dismantling shop with a surrounding yard used for transformer off-loading and storage. A concrete secondary containment pad was used for the storage of 55-gallon drums and oil storage tanks (1-375 gal and 2-500 gal) containing fluids drained from the transformers.

The facility also used a high-temperature oven to burn residual oils, paper and varnish from the copper and aluminum transformer cores. It was reported that the owner used the oil in the past for weed control in the 1970's. The past use of polychlorinated biphenyls (PCBs) in electrical equipment such as transformers and capacitors was common until 1979 when PCBs were banned in the United States and became regulated under 40 C.F.R. Part 761.

The transformer dismantling shop and concrete containment pad used for transformer dismantling and storage of transformer oil remain at the Site. The Site is directly bordered by residential properties and a Leonard Independent School District (LISD) Daycare Facility to the south with the LISD Elementary schools just south of the Daycare Facility; residences on the north and west; and Leonard High School, Junior High School, and Intermediate School to the East. The Site predominantly drains to the southeast; south along roadside ditches on North Poplar Street toward the Leonard Elementary school, then east along East Hackberry Street.

The Site is located within non-designated Segment No. 0306 at the western extreme of the Sulphur River Basin, which flows east joining the Middle and North Sulphur Rivers and converges with the Red River 308 miles downstream in Arkansas. The major tributaries of the Sulphur River are Days Creek and White Oak Bayou.

The average annual precipitation of Leonard, Texas is 43 inches with approximately 230 sunny days per year. The average temperature ranges from 33 degrees Fahrenheit in the winter to 93 degrees Fahrenheit in the summer. The average annual snowfall is 1 inch.

The Site lies approximately 700 feet above sea level with an apparent gentle slope to the south. The Site is

within Fannin County, which lies in the northern fringe of the Texas Blackland Prairie, which extends through North Central Texas and is characterized by broad flood plains and shallow stream valleys. Information obtained from the U.S. Department of Agriculture (USDA) indicated that the soils generally consist of shallow, well-drained, moderately permeable, loamy soils that are formed in chalk or in chalk interbedded with marl.

The EPA removal program conducted an investigation of the Site in May 2018 and determined that various contaminants of concern (COCs), including PCBs, semi-volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), and metals, in the soil had migrated off-site.

1.1.2.1 Location

905 N. Poplar
Leonard, Fannin County, TX 75452

1.1.2.2 Description of Threat

EPA has documented the contamination on the residential properties, alleyway, and drainage ditches surrounding the Site and have determined that it is associated with the operations conducted on the Site. EPA believes that much of the off-site contamination is associated with erosional migration from the Site or application of the oils as a weed killer. PCBs are the primary contaminant of concern although additional contaminants are co-located with the PCB contaminants and will be addressed as part of this response.

The contaminants listed in 1.1.3 below, PCBs, arsenic, cobalt compounds, copper, lead, manganese compounds, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. § 302.4.

The contaminants listed above are located on the non-fenced facility property as well as within public right-of-ways and residential properties allowing public access and potential exposure to those entering or using those areas for recreation or other purposes. The primary threat is for inadvertent ingestion but also to direct contact and inhalation especially to young children whom have the tendency to play in the soils. It also presents a threat to workers who may have to perform utility repairs.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site is the location where facility operations were conducted as well as those areas surrounding the facility property Historical sampling conducted on the Site has shown PCB soil contamination. The contaminants identified in the on-site areas (industrial facility and associated drainage ditches) and those for the off-site areas (residential, school, daycare, alleyway and associated drainage ditches) during the April/May 2018 assessment are as follows:

Analyte	On-Site Areas	Off-Site Areas
PCB (total):	up to 175 mg/kg	up to 95.1 mg/kg
Arsenic:	up to 68.2 mg/kg	up to 59.1 mg/kg
Cobalt:	up to 30.9 mg/kg	up to 23.6 mg/kg
Copper:	up to 21,800 mg/kg	up to 6740 mg/kg
Lead:	up to 1,480 mg/kg	up to 402 mg/kg
Manganese:	up to 4,490 mg/kg	up to 3290 mg/kg
Benzo(a)pyrene:	up to 0.13 mg/kg	up to 13.3 mg/kg
Benzo(a)anthracene	less than 1.1 mg/kg	up to 9.8 mg/kg
Benzo(b)fluoranthene	less than 1.1 mg/kg	up to 16.5 mg/kg
Dibenzo(a,h)anthracene	less than 0.11 mg/kg	up to 2.97 mg/kg
Indeno(1,2,3-cd)pyrene	less than 1.1 mg/kg	up to 15.2 mg/kg

The Site and the surrounding alleyway, drainage ditches, residential properties, and school properties immediately surrounding the Site are the subject of this removal action and have been impacted by erosional runoff from the Site with similar contaminant impacts.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA actions for this cleanup will be to excavate and dispose of contaminated soils to an approximate depth of 24 inches and restore those properties with clean backfill to pre-existing conditions.

2.1.2 Response Actions to Date

This action is the initial response action associated with this site. There have been previous investigations which occurred in 1990/1991, 1995, and 1998 which showed elevated concentrations of PCBs in on-site and off-site areas.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The EPA Superfund Enforcement team is continuing to evaluate the liability and viability of tentatively identified PRPs and will pursue those parties as evidence becomes available.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

The specific actions anticipated are as follows:

a. Demolish on-site transformer dismantling facility and dispose/recycle generated C&D wastes;
b. Evaluate and dispose of abandoned drums located on-site;
c. Excavate off-site areas from furthest away towards the site;
d. Stockpile waste based upon TSCA (50 ppm or greater PCBs) or Non-TSCA (< 50 ppm PCBs);
e. Dispose of waste at appropriate landfills based upon PCB concentration and other analytical results (ie. TSCA Lanfill, Class 1 Industrial Landfill, or Class 2 Industrial Landfill);
f. Restore properties to pre-existing conditions

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

The initial EPA team action associated with this site at the completion of site setup activities will be the demolition of the on-site transformer dismantling building expected to begin on or before November 9. The next step will be to begin excavation activities on or before November 12.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,619,000.00	$0.00	$1,619,000.00	100.00%
START - Tech Assistance	$200,000.00	$0.00	$200,000.00	100.00%
Contingency	$161,000.00	$0.00	$161,000.00	100.00%
Intramural Costs				
USEPA - Direct	$162,000.00	$0.00	$162,000.00	100.00%
USEPA - InDirect	$1,009,000.00	$0.00	$1,009,000.00	100.00%
Total Site Costs	$3,151,000.00	$0.00	$3,151,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Texas Commission on Environmental Quality
Texas Department of State Health Services
Agency for Toxic Substances and Disease Registry

4. Personnel On Site

2 EPA
2 START
10 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.